

Exhibit “A”

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

STARLYN PANIAGUA,

Plaintiff,

-against-

IME LOGISTICS, LLC, YOUSSEF WALID
MOHAMED and MELISSA SUE YOUSSEF,

Defendants.

Index No.:

Date purchase:

Plaintiff Designates
Bronx

County as the place of trial

The basis of venue is
Plaintiff's Residence

SUMMONS

Plaintiff resides at
739 St. Anns Ave., BX, NY
County of Bronx

To the above named Defendant

YOU ARE HEREBY SUMMONED to answer, or, if the complaint is not served with this summons, to serve notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: April 20, 2022

Defendants' address:

301 W. Las Colinas Blvd., Apt, 150, Irving TX 75039



Andrew B. Siegel

GOIDEL & SIEGEL, LLP

Attorney(s) for Plaintiff
Office and Post Office Address
56 West 45th Street-3rd Floor
New York, NY 10036
(212) 840-3737

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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STARLYN PANIAGUA,

Index No.:

Plaintiff,

COMPLAINT

-against-

IME LOGISTICS, LLC, YOUSSEF WALID
MOHAMED and MELISSA SUE YOUSSEF,

Defendants.

-----X

Plaintiff, by his attorneys, Goidel & Siegel, LLP for his
complaint against defendants, respectfully alleges as follows:

THE PARTIES AND FIRST CAUSE OF ACTION

1. Plaintiff is a resident of the State of New York with a
primary residence in Bronx County.

2. IME LOGISTICS, LLC ("IME") is a limited liability company
organized and existing by virtue of the laws of the State of Texas,
with a primary place of business at 301 W. Las Colinas Blvd., Apt.,
150, Irving TX, 75039.

3. YOUSSEF WALID MOHAMED ("YWM") is a resident of the State
of Texas with a primary residence at 301 W. Las Colinas Blvd., Apt,
150, Irving TX, 75039.

4. MELISSA SUE YOUSSEF ("MSY") is a resident of the State of
Texas with a primary residence at 301 W. Las Colinas Blvd., Apt,
150, Irving TX, 75039.

5. On July 22, 2021, plaintiff operated a 2009 Infiniti
automobile ("Vehicle 1") bearing New York State license plate

number "KLE3889".

6. On July 22, 2021, IME owned a Freightliner tractor-trailer("Vehicle 2") bearing Texas State license plate number "R543455".

7. On July 22, 2021, IME leased Vehicle 2 from an as-yet unknown person or entity.

8. On July 22, 2021, YWM owned Vehicle 2.

9. On July 22, 2021, YWM leased Vehicle 2 from an as-yet unknown person or entity.

10. On July 22, 2021, MSY owned Vehicle 2.

11. On July 22, 2021, MSY leased Vehicle 2 from an as-yet unknown person or entity.

12. On July 22, 2021 at approximately 1:00 A.M., plaintiff operated Vehicle 1 on northbound Bronx River Avenue, Bronx, New York, at and around its intersection with Westchester Avenue.

13. On July 22, 2021 at approximately 1:00 A.M., YWM operated Vehicle 2 on northbound Bronx River Avenue, Bronx, New York, at and around its intersection with Westchester Avenue.

14. YWM operated Vehicle 2 with the express and implied permission and consent of its owner.

15. On July 22, 2021, YWM was an owner of all or a part of IME.

16. On July 22, 2021, YWM was an employee of IME.

17. On July 22, 2021, YWM was an agent of IME.

18. On July 22, 2021, MSY was an owner of all or a part of IME.

19. On July 22, 2021, MSY was an employee of IME.

20. On July 22, 2021, YWM operated Vehicle 2 within the scope of, and as a consequence of, his employment and/or agency with IME.

22. On July 22, 2021 at the time of the collision set forth below, YWM was acting within the express and implied scope of his employment and/or agency with IME.

23. At the foregoing time and place, YWM collided Vehicle 2 into Vehicle 1, while Vehicle 1 was fully and completely stopped.

24. As a direct result of this collision, Plaintiff sustained serious, severe and permanent physical injuries.

25. The collision and the injuries sustained by Plaintiff were caused solely by the negligence of the defendants.

26. Plaintiff is a covered person as defined by New York State Insurance Law §5102.

27. Plaintiff sustained serious personal injuries as defined in §5102 of the New York State Insurance Law.

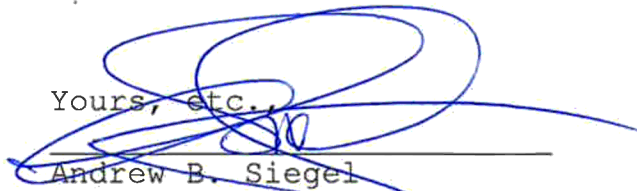
28. This action is exempt from the provisions and limitations of CPLR Article 16 as to joint and several liability.

WHEREFORE, Plaintiff demands judgment against Defendants in an amount exceeding the jurisdictional limit of all inferior trial courts of this State; and for such other and further relief as this

court deems just and proper.

Dated: New York, New York
April 20, 2022

Yours, etc.,


Andrew B. Siegel

GOIDEL & SIEGEL, LLP

Attorney(s) for Plaintiff

56 West 45th Street-3rd Floor

New York, New York 10036

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